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12 Attorneys for Defendants
SONY COMPUTER ENTERTAINMENT AMERICA LLC
13 SONY NETWORK ENTERTAINMENT INTERNATIONAL
LLC
14

15 UNITED STATES DISTRICT COURT
16
NORTHERN DISTRICT OF CALIFORNIA
17
SAN FRANCISCO DIVISION

18
19 ABRAHAM JAY KAHAN, Individually and on
20 Behalf of All Others Similarly Situated

21 Plaintiff,

22 v.

23 SONY COMPUTER ENTERTAINMENT
24 AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

25 Defendants.

Case No. 3:11-cv-02256-EMC

**STIPULATION AND [PROPOSED]
ORDER TO VACATE CASE
MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES**

reset CMC

Judge: Hon. Edward M. Chen

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STIPULATION AND PROPOSED ORDER TO VACATE
CASE MANAGEMENT CONFERENCE
AND ASSOCIATED DEADLINES
Case No. 3:11-cv-02256-EMC

1 **STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE AND**
2 **ASSOCIATED DEADLINES**

3 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
4 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
5 (collectively, the “Sony Defendants”), have been named as defendants in at least sixty-two (62)
6 putative class action lawsuits, including this lawsuit, to date;

7 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
8 Litigation (the “JPML”) to centralize this and other matters before a single district court, to which
9 multiple responses, including the Sony Defendants’ response, have been filed to date and are
10 under submission before the JPML, with a hearing date of July 28, 2011;

12 WHEREAS, the current date of the initial Case Management Conference (“CMC”) in this
13 case is August 17, 2011 and certain other deadlines are set forth in the Order Setting Initial Case
14 Management Conference and ADR Deadlines;

15 WHEREAS, the parties have agreed that it is in the best interests of all parties to vacate
16 the CMC and associated deadlines in this case in order to facilitate the scheduling of this matter in
17 coordination with the schedule for the motion and hearing before the JPML;

19 NOW, THEREFORE, all parties, by and through their respective counsel, hereby stipulate
20 for an order as follows:

21 In light of the motion for centralization pending before the JPML, the CMC and all
22 associated deadlines, including those set forth in the Order Setting Initial Case Management
23 Conference and ADR Deadlines, in the above-entitled action shall be vacated and further pretrial
24 and scheduling matters shall be addressed by the transferee judge following centralization or, in
25 the event such motion for centralization is denied, the defendants will notify the Court within a
26 reasonable time thereafter, so that the Court may at that time issue a revised case schedule.

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2 Dated: July 20, 2011

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5 SETH M. LEHRMAN
6 STEWART JAFFE
7 FARMER, JAFFE, WEISSING, EDWARDS,
8 FISTOS & LEHRMAN, P.L.

9
10 By: /s/ Seth M. Lehrman /s/ [as authorized]
11 Seth M. Lehrman

12
13 Attorneys for Plaintiff
14 ABRAHAM JAY KAHAN

15 Dated: July 20, 2011

16 HARVEY WOLKOFF
17 THAD A. DAVIS
18 ROCKY C. TSAI
19 ROPES & GRAY LLP

20 By: /s/ Rocky C. Tsai /s/
21 Rocky C. Tsai

22 Attorneys for Defendants
23 SONY NETWORK ENTERTAINMENT
24 AMERICA, INC.; SONY COMPUTER
25 ENTERTAINMENT AMERICA LLC;
26 SONY NETWORK ENTERTAINMENT
27 INTERNATIONAL LLC

28 **[PROPOSED] ORDER**

1 PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference
2 set for 8/17/11 is reset for 2/17/12 at 9:00 a.m. A Joint CMC statement shall be filed by 2/10/12.

3 Dated: 7/25/11

4 By: S. District Court Judge

